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August 25, 2005

Upper Mississippi River NW&FR
CCP Comment
Room 105
51 East Fourth Street
Winona, MN 55987

To whom it may concern:

The Sierra Club, 750,000 of your friends and neighbors, is the oldest and largest grassroots conservation group in the United States. We would like to thank the United States Fish and Wildlife Service (FWS) for the opportunity to present our views on the proposed Upper Mississippi River National Wildlife and Fish Refuge (hereinafter referred to as the Refuge) Comprehensive Conservation Plan and Draft Environmental Impact Statement (CCP). The establishment of the Refuge in 1924 has provided preceding generations with opportunities for traditional recreation like fishing, hunting and trapping. Up until now, these opportunities have been allowed in a very much unfettered way. As our populations increase and our actions and activities displace wildlife from their traditional areas, the way the Refuge has been handled in the past places the Refuge, its inhabitants and visitors, at risk from increasing impacts. In light of an ever-growing human population and increasing consumption of resources by those individuals, we need the National Wildlife Refuge System's mission to succeed now, more than ever.

Sierra Club members have a long history of speaking for those in nature who have no voice in public policy. In the FWS efforts to engage the public on the CCP, this traditional Sierra Club-member effort became very difficult. Many who would normally speak to issues regarding the CCP were dissuaded by the attitude of attendees at planning or informational meetings and either stayed away from them or chose not to stand and present their views due to an overwhelming sense of intimidation. Therefore, we call on FWS to recognize all submissions, whether stated or written, as equal.

The Sierra Club understands there are currently four options that have been presented to the public (Alternatives A-D). With the information available to us at this time, the Sierra Club supports (FWS preferred) Alternative D because it promotes a better way of managing the Refuge. Sierra Club agrees that by placing greater responsibility on those practicing traditional activities on the Refuge while affording additional opportunities to other forms of recreation that have not traditionally been practiced on the Refuge - all visitors, residents, and users can be accommodated while still providing for wildlife's needs.

Sierra Club understands a fifth alternative (Alternative E) will be made available shortly after the end of the current comment period. We hope the FWS will consider everyone's views and include the many positive aspects from their Alternative D preferred approach into their Alternative E proposal.

We find all of the aspects of Alternative D encouraging and feel that very little should change in any future proposed alternative such as the Alternative E currently being discussed by FWS staff.

In general, the plan must include greater coordination and partnering among federal, state, and local entities regarding management, funding, and improved monitoring and recordkeeping of Refuge activities and wildlife and plant populations. Implementation of

Army Corps of Engineers (ACoE) Environmental Management Program (EMP) and the Navigation and Environmental Sustainability Program (NESP) need to have full funding and implementation. Implementation of the River Resources Forum's (RRF) pool plans need to be undertaken and underwritten.

The following comments reflect our views and opinions regarding the six goals in Alternative D outlined by FWS staff in the CCP.

Goal 1 Landscape – FWS will strive to maintain and improve the scenic qualities and wild character of the Refuge.

Sierra club feels it is imperative that FWS maintain the integrity of the Refuge boundary to ensure that the Refuge mission is fulfilled and discipline maintained on all publicly owned lands within the boundary of the Refuge. Encroachment of tree cutting, mowing, construction and dumping practices should be prevented from occurring within the Refuge.

Sierra Club feels additional land acquisition should remain a priority. About 30,000 acres within the approved Refuge boundary remain yet unsecured. As development occurs along the Refuge boundary, and in adjacent areas which have been traditionally used by many living organisms besides humans, the Refuge's role in the success of viable populations of migratory and native wildlife and plants in this area will increase. In addition, the following goals need to remain in the final CCP.

- Seeking a goal of acquiring 1000 acres of the lands identified in the 1987 Master Plan will improve the Refuge's ability to fulfill its mission and provide for future generations.

- Seeking targeted funding, prioritizing acquisitions, and seeking willing partners in this undertaking will help expedite meeting the Refuge's objectives.

- Bluff lands around the Refuge hold special places for many of the inhabitants and visitors to the Refuge. FWS should ensure adequate efforts to secure those areas from development and keep them for future generations to enjoy.

FWS needs to make sure research areas and special designations are put in place in order to help achieve the status of a "Wetland of International Importance" and this should be paramount to achieving the CCP. This area of the river has long been held in high esteem for its ability to provide wetland habitat for native and migratory populations. As the FWS points out, "Up to 40 percent of the continent's waterfowl use the Mississippi Flyway during migration, and up to 50 percent of the canvasback ducks and 20 percent of the eastern United States population of Tundra Swans stop in the Refuge during fall migration." Creating a cooperative approach among, and within, agencies with jurisdiction over the Refuge should be stressed in all aspects of the CCP.

Goal 2 Environmental Health Issues – FWS will strive to improve the environmental health of the Refuge by working with others.

Sierra Club agrees with FWS statement that, "The quality of water on the Refuge is one of the most important factors influencing fish, wildlife, and aquatic plant populations and health, which in turn influence the opportunity for public use and enjoyment." Improving water quality in the refuge will have upstream and downstream benefits. All aspects which will have beneficial impacts on water quality should be maintained in the final CCP.

In order to achieve healthy habitat and ensure proper plant communities exist, FWS and ACoE need to coordinate and pursue additional water level management strategies. Providing natural fluctuations in water levels and increasing beneficial plant production will have profound implications on the success of the Refuge. Providing a seasonal drawdown on pools will render positive impacts on the amount of beneficial emergent aquatic weeds present in the refuge and help deter invasive plants and animals. This will in turn provide greater habitat and food production for native and migrating wildlife.

Sierra Club supports all FWS efforts to prevent the introduction and eradicate existing invasive species in the Refuge. Both plant and animal invaders threaten the balance of native species and the biological integrity of the Refuge.

Goal 3 Wildlife and Habitat Issues – FWS will manage habitat to support diverse and abundant native fish, wildlife, and plants.

Sierra Club supports increased research and documentation of wildlife activities on the Refuge. Fish, wildlife and plant populations, whether present in small numbers or great abundance, need better understanding. Coordination of federal, state, and local efforts will help ensure this happens. For those harvested species, whether purposeful or accidental, recreational or commercial, greater priority should be placed in gaining greater understanding of those populations' dynamics.

We further believe that reintroduction of extirpated species, when prudent, should remain a priority. The ability to create and maintain healthy, balanced ecosystems will result in the ability for the Refuge to better withstand any future aberrations, whether climactic or otherwise, which may affect it.

Sierra Club supports the 50-year-plan process for each of the pools present within the Refuge. Throughout the planning document, however, data important to understanding recreational impacts on the refuge is either incomplete or missing. Here, as in all of the goals, coordination with all federal, state and local entities with jurisdiction on the Refuge is critical to success. The Upper Mississippi River Conservation Committee (UMRCC), RRF, and other entities with some working relationship to the Refuge are mentioned infrequently in the planning document yet seem to be critical to the refuge's current management efforts. There seems to be a much greater role for a coordinated conservation effort. Therefore, we recommend that a multi-state and federal committee, that includes member of interested parties within the public, be established to monitor and provide coordinated reporting on activities taking place on the refuge. This can be achieved either through a reinvigorated UMRCC or through the development of a new entity.

Sierra Club supports FWS in their effort to better understand wildlife on the refuge by increasing non-game research and protection efforts. Many impacted species face extirpation from the refuge such as soft-shell turtles. Increasing visitor impacts lead to loss of traditional nesting areas for some wildlife. Increases in other disturbances force wildlife to adapt or seek other quieter, safer locations potentially outside of the refuge where other disturbances such as land development could ultimately lead to their loss throughout the area. FWS needs to increase research and protection for these populations to secure a place for them within the Refuge.

Goal 4 Wildlife-Dependant Recreation Issues – FWS will manage public use programs and facilities to ensure abundant and sustainable hunting, fishing, wildlife observation, wildlife photography, interpretation, and environmental education opportunities for a broad cross-section of the public.

Sierra Club supports continued traditional means of harvesting wildlife from within the refuge. Hunting remains a priority use of the refuge and Sierra Club endorses hunting as a management tool for wildlife populations. However, the understanding of how to best manage the populations within the Refuge has changed since the original closed-area system was put into place in 1957-58.

Sierra Club agrees with FWS plans to close wildlife areas critical to migratory waterfowl thereby increasing survival rates during migration and nesting. This is essential to the success of the Refuge. Since the current closed area system was established in 1958, modernization of the plan is essential to ensuring the refuge can complete its mission. As other lands adjacent to the river get developed, the refuge's importance for successful migration for waterfowl and neo-tropical birds as part of the Mississippi Flyway will increase. While some may find this aspect objectionable, the acreage slated for closure is minimal and scientifically justified.

In order to make the transition more palatable to those in opposition, Sierra Club recommends a process similar to the US Dept of the Interior practice for eliminating inholdings in wilderness areas. Current holders of permanent blinds would be allowed to continue to hold them for their lifetime. When that person is deceased, all holdings will revert to back the Refuge. In areas where overcrowding exists, options for another location could be offered under the same lifetime-limited scenario.

Sierra Club agrees with FWS plans to limit waterfowl hunters on the refuge to a 25 shot shell limit while hunting. Hunting season mortality to waterfowl from wounds received leads to unretrieved, downed birds and reduced survivorship during migration. By limiting the number of shells, losses due to wounding should decrease and consideration of prudent shots to take would increase. This, in turn, would result in reduced litter from hunters (unretrieved, spent shotgun shells, shotgun shell wads, and

birdshot itself) in the Refuge. For those individuals new to waterfowl hunting, a modest increase over the 25-shotshell limit might be considered.

It should be plain to all, a National Wildlife Refuge is not the place to practice or learn shooting. The number of shells available to a hunter should be for the sole purpose of hunting. Hunters should be confident they can succeed in their hunt with more than ten times the shells necessary to fill their daily bag limit.

Goal 5 Other Recreational Issues – FWS will provide opportunities for the public to use and enjoy the Refuge for traditional and appropriate non-wildlife-dependent recreation that is compatible with the purpose for which the Refuge was established and the mission of the Refuge System.

Sierra Club supports FWS efforts to help broaden public use of the refuge by increasing opportunities for recreational activities including bird watching, canoeing, and hiking. These recreational activities on the refuge have been underserved in the past. Increases in facilities, programs, trails and access would benefit all users. There is increasing interest in accessing such opportunities. The refuge could provide excellent opportunities for such activities for local and area residents and visitors.

Sierra Club supports FWS plans to reduce the greatest impacts from current activities by increasing management of overused/abused areas. Due to the Refuge's few improvements and the relatively primitive nature of many highly utilized areas, only a few visitors can have adverse impacts on the resource. Increasing oversight to reduce

impacts from recreational users and allowing closure of abused areas will improve the quality of the experience for most everyone.

Sierra Club supports FWS plans to establish more electric motor-only areas. The need to minimize the impacts of noise and erosive forces from operating motor boats is essential to ensuring the mission of the refuge will be fulfilled. Due to the conversion of the outboard industry to cleaner and quieter motors and concerns raised about boater safety in fast-flowing waters, at a minimum in lieu of electric motor-only, no wake areas may be established for those areas. In those areas where safety isn't a concern, electric-only motor operations should be established. For areas where minimization of noise and wave action is sought, a limited time-frame of operation for powered watercraft from one hour after sunrise until one hour prior to sunset might be considered.

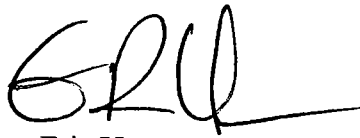
Sierra Club supports the authorization of work and exercise areas for dogs. These should not be allowed throughout the Refuge, but should be limited to specific areas during those times indicated by FWS, from April until opening of hunting season and should consider the health of the Refuge and the wildlife populations in it.

Goal 6 Administration and Operations – FWS will seek adequate funding, staffing, and facilities, and improve public awareness and support, to carry out the purposes, vision, goals, and objectives of the Refuge.

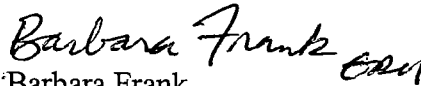
Sierra Club encourages the FWS in establishing greater public awareness through increasing their presence on the Refuge. Greater coordination with state and local entities involved in the management of the Refuge should be sought and promoted.

While Sierra Club is generally opposed to user-fees for unimproved areas, the establishment of fees for Refuge-administered boat ramps seems prudent. This will help all agencies and coordinating efforts to better understand the typical recreational user. A minimal fee to help offset the staffing needs and to give some ability to monitoring boaters activities while in the Refuge will help in the long run to manage the resource more effectively.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Uram".

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